

U.S. Department of Energy
Office of River Protection
Mr. Michael K. Barrett
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 020503

Dear Mr. Barrett:

**CONTRACT NO. DE-AC27-01RV14136 – REQUEST FOR REVIEW AND APPROVAL OF
THE LIMITED CONSTRUCTION AUTHORIZATION REQUEST FOR THE RIVER
PROTECTION PROJECT – WASTE TREATMENT PLANT**

- References:
- 1) CCN 018850, Letter; R. F. Naventi, BNI, to W. J. Taylor, ORP; “Intent to Submit Limited Construction Authorization Request for the River Protection Project Waste Treatment Plant”, dated March 08, 2001.
 - 2) CCN 019345, Letter; R. F. Naventi, BNI, to W. J. Taylor, ORP; “Limited Construction Authorization Request for the River Protection Project Waste Treatment Plant Submittal Date Extension”, dated April 12, 2001.
 - 3) CCN 019704, Letter; M. K. Barrett, ORP, to R. F. Naventi, BNI; “Office of River Protection (ORP) Approval of Bechtel National, Inc. (BNI) Request for an Extension for Submittal of the Limited Construction Authorization Request”; 01-OSR-0135, dated April 18, 2001.
 - 4) CCN 014189, Letter; S. R. Morgan, BNFL Inc., to D. C. Gibbs, DOE RU; “Limited Construction Authorization Request River Protection Project – Waste Treatment Plant”, dated June 26, 2000.
 - 5) CCN 016838C, Letter; D. C. Gibbs, DOE RU, to P. O. Strawbridge, BNFL Inc.; “Questions/Comments on Limited Construction Authorization Request”; 00-RU-0517, dated July 28, 2000.

Bechtel National, Inc. (BNI) is pleased to submit, for the U. S. Department of Energy’s (DOE), Office of Safety Regulation (OSR) review and approval, the Limited Construction Authorization Request (LCAR) for the River Protection Project – Waste Treatment Plant (WTP) (Attachment 1). This request is for authorization to perform limited construction activities for which notification of intent to submit was provided in Reference 1, per Contract Standard 7, Section e(2)(x). Reference 2 extended the LCAR submittal date from April 27, 2001 to June 5, 2001. The June 5, 2001 LCAR submittal date was approved by the Office of River Protection, per Reference 3.

This LCAR supercedes the previously submitted BNFL Inc., LCAR (Reference 4). The comments and questions provided in Reference 5 have been resolved and incorporated. Responses to the specific questions and comments provided in Reference 5 are included as Attachment 2.

In preparation for construction of the main facilities and buildings of the WTP, BNI requests approval to prepare the site, complete major excavation, place mud mats, and begin construction of temporary and permanent facilities that would support initial construction activities. Current baseline schedules including activities within the scope of this LCAR are provided in Attachment 3. Scheduled activities include the essential steps to mobilize on-site and to begin construction per the project schedule. The benefit of authorizing this work in advance of the Construction Authorization is to support start of hot commissioning in 2007.

The 10CFR830.206 rule states “that DOE may authorize the contractor to perform construction activities . . . without approval of the PSAR if DOE determines the activities are not detrimental to public health and safety and are in the best interests of DOE.” The draft DOE guidance for limited construction activities before the PSAR is approved states the contractor is to describe the activity requested, the reason for the request, the benefit to DOE of the request, the effect of the delay in conducting the activities, and the risks associated with performing the activity. Attachment 4 provides the information necessary to satisfy the requirements of the 10CFR830.206 rule.

Attachment 5 provides a correlation of LCAR review criteria from RL/REG-99-017, Rev. 4, “Review Guidance for the Limited Construction Authorization Request (LCAR)”, to applicable sections of the LCAR.

Drawings referenced in the LCAR are provided as Attachment 6. These drawings are consistent with the baseline design. As stated in Section 1.4 of the LCAR, the baseline design may change prior to start of limited construction. Changes to the baseline design will be evaluated and processed in accordance with project authorization basis change control procedures. Drawings referenced in the LCAR that are changed following LCAR submittal will be provided to OSR as they become available for consideration in the LCAR review process. The LCAR text will be revised to reflect design changes made after this submittal, and to reflect OSR review comments, prior to the OSR readiness inspection.

Procedures described in the LCAR will be available for inspection by August 20, 2001 to support LCAR activities. Referenced documents, such as the Quality Assurance Program and the Radiation Protection Program for Design and Construction, have been submitted separately. Standards cited in the LCAR that do not specify the year or revision will be included in the technical specifications with the year and revision identified.

If you have any questions, please contact Mr. Bill Spezialetti at (509) 371-4654 or Mr. Dennis Klein at (509) 371-4867.

Very truly yours,

A. R. Veirup
Prime Contract Manager

JD/jd

Attachments 1) Limited Construction Authorization Request, RPT-24590-CN00001, Rev. 0
 2) Responses to 00-RU-0517 Questions and Comments
 3) LCAR Schedule
 4) 10CFR830.206 Justification
 5) RL/REG-99-17, Rev. 4 Matrix
 6) Drawings Referenced in LCAR

cc:

Barr, R w/a	DOE/ORP	H6-60
Beranek, F w/o	RPP-WTP	P127
Clements, W w/o	RPP-WTP	ETC2-236
DOE Correspondence Control w/a	DOE/ORP	H6-60
Duke, J w/a	RPP-WTP	R117
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Fick, K w/a	DOE/ORP	H6-60
Hicks, J. Q. w/a	RPP-WTP	E246
Klein, D w/o	RPP-WTP	P129
Lawrence, R w/o	RPP-WTP	A114
Marsh, F w/o	RPP-WTP	A216
PDC w/a	RPP-WTP	K110
Naventi, R w/o	RPP-WTP	A110
Struthers, D w/o	DOE/ORP	H6-60
Taylor, W w/a	DOE/ORP	H6-60